

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JEROME O'HARA,

BERNADETTE O'HARA,

O'HARA FAMILY PARTNERSHIP,

ELIZABETH SARRO,

GEORGE PEREZ, and

JEANETTE PEREZ,

Defendants.

Adv. Pro. No. 10-04272 (SMB)

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,
that the time by which defendants O'Hara Family Partnership and Elizabeth Sarro (collectively,
"Defendants") may move, answer, or otherwise respond to the Trustee's complaint (the

“Complaint”) is extended up to and including September 15, 2015. The pre-trial conference shall be adjourned from September 23, 2015, to November 18, 2015, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendants to move, answer, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendants’ right to request from the Court a further extension of time to move, answer, or otherwise respond to the Complaint and/or the Trustee’s right to object to any such request.

Undersigned counsel for Defendants: (i) expressly represents that as of the date of this Stipulation, all Defendants represented by the undersigned counsel in the adversary proceeding are alive or that counsel has previously provided notice to the Trustee in writing of a Defendant’s death; (ii) expressly agrees to notify the Trustee in writing of the death of any Defendant within thirty (30) days of the date of such Defendant’s death, and to provide to the Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising the Trustee whether a probate has or will be filed, (b) filing a Stipulation substituting the deceased Defendant’s estate or personal representative/executor, and/or (c) advising the Trustee who will represent the deceased Defendant’s estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this Stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the Stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 10106).

Dated: July 15, 2015
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Ona T. Wang
Email: owang@bakerlaw.com

*Attorneys for Plaintiff Irving R. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

LAX & NEVILLE, LLP

By: /s/ Gabrielle J. Pretto
1450 Broadway, 35th Floor
New York, New York 10018
Telephone: (212) 696-1999
Facsimile: (212) 566-4531
Brian J. Neville
Email: bneville@laxneville.com
Gabrielle J. Pretto
Email: gpretto@laxneville.com

*Attorneys for Defendants O'Hara Family Partnership
and Elizabeth Sarro*